Optimised AI Limited

Intellectual Property Management

Documentation of approach to copyright compliance,
including licensing of training data and attribution mechanisms.

Document Owner	Optimised AI Limited — Board of Directors
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1. Purpose

This document outlines the intellectual property (IP) management framework for Optimised AI Limited (trading as GetFrugal). It describes how we ensure copyright compliance across our AI systems, including the provenance and licensing of all training data, our approach to attribution, and our procedures for managing IP-related risks.

2. AI System IP Overview

GetFrugal's AI system is entirely proprietary and developed in-house by the Optimised AI Limited team. We do not use third-party AI models (such as OpenAI, Google, or similar) as the foundation of our service. This gives us full control over, and visibility into, the intellectual property profile of our technology stack.

2.1 Ownership

- All AI algorithms, models, and software code are owned outright by Optimised AI Limited
- No third-party AI model licences are required for the operation of the platform
- The AI system was built from the ground up by our development team using standard, open-source machine learning libraries and frameworks (which are used under their respective permissive licences, e.g., MIT, Apache 2.0)

3. Training Data Provenance and Licensing

The data used to develop and train our AI models falls into the following categories:

3.1 Publicly Available Deal and Pricing Data

Our AI analyses publicly available information about deals, discounts, cashback offers, and loyalty rewards from UK retailers. This data is:

- Sourced from publicly accessible websites and retailer APIs where available
- Used for factual comparison and analysis purposes, which constitutes a lawful and legitimate use
- Not reproduced or republished in its original form — our system extracts factual pricing data points, which are not subject to copyright protection under UK law (facts and data are not copyrightable; only their creative expression is)
- Refreshed regularly to ensure accuracy, with outdated data removed from our systems

3.2 User-Provided Transaction Data

Users voluntarily upload their own bank statement or transaction data for analysis. This data:

- Belongs to the user and is processed solely for the purpose of delivering the GetFrugal service under the user's contract
- Is not incorporated into model training datasets without explicit, separate consent

- Is subject to the data retention and deletion policies set out in our Data Governance Policy

3.3 Open-Source Software and Libraries

Our technology stack makes use of open-source software components. All open-source dependencies are:

- Used under permissive licences (MIT, Apache 2.0, BSD) that allow commercial use
- Documented in a software bill of materials (SBOM) maintained by the development team
- Regularly audited for licence compliance to ensure no copyleft or restrictive licences are inadvertently introduced

4. Copyright Compliance Framework

4.1 Content the AI Produces

GetFrugal's AI outputs consist of: categorised transaction labels, numerical savings estimates, factual descriptions of available deals and offers, and personalised recommendations text. These outputs are factual and analytical in nature. They do not reproduce creative works, articles, images, or other content that would engage third-party copyright.

4.2 Content the AI Does Not Produce

Our AI system does not generate: creative written content (articles, stories, marketing copy); images, audio, or video; reproductions or paraphrases of third-party copyrighted text; or any content that could infringe the IP rights of third parties.

4.3 Attribution

Where our platform references specific deals, offers, or retailer information, we attribute the source by linking to the retailer's own page or including the retailer's name alongside the factual deal details. We do not claim ownership of third-party deal information and present it purely as factual reference data to assist users.

5. IP Risk Management

- **All new AI features and outputs are reviewed for potential IP concerns before release**Pre-launch review:
- **We monitor for any third-party IP claims or takedown requests and respond promptly**Ongoing monitoring:
- **Our data collection processes respect robots.txt directives and do not circumvent access controls or paywalls**No scraping of protected content:
- **Any material change to data sources or AI output types is reviewed by the directors with external legal consultation where appropriate**Legal review:

6. Third-Party IP Complaints

If any third party believes that GetFrugal is infringing their intellectual property rights, they may contact us at our registered office address (Bartle House, 9 Oxford Court, Manchester, England, M2 3WQ). We will acknowledge any complaint within 5 business days and investigate within 14 business days. If infringement is confirmed, we will take prompt corrective action, including removing or modifying the relevant content or data source.

7. Summary

Given that GetFrugal operates an entirely proprietary, in-house AI system focused on factual analysis of spending data and publicly available deals, the IP risk profile is minimal. We do not use third-party AI models, do not generate creative content, and do not reproduce copyrighted material. Our approach to IP management is proactive, documented, and subject to regular review.